

REMARKS

This response is intended as a full and complete response to the Final Office Action dated August 3, 2006. In view of the following amendments and discussion, the Applicant believes that all claims are in allowable form.

CLAIM REJECTIONS

35 U.S.C. §102 Claims 1-2

Claims 1-2 stand rejected under 35 U.S.C. § 102(a) as being anticipated by United States Patent Publication No. 2003/0075109 published April 24, 2003, to *Arai* (hereinafter referred to as *Arai*). In response, the Applicant has amended claim 1 and cancelled claim 23 to more clearly recite certain aspects of the invention.

Independent claim 1 recites elements not taught or suggested by *Arai*. *Arai* teaches using lift pins 13 inserted into through holes 12b formed in a substrate support 12. Through holes 12b are formed on a bottom surface 12c of a pocket portion 12a of the substrate support 12, thereby allowing the lift pins 13 passing through the through holes 12b and contact a bottom surface of the substrate 20. Therefore, the lift pins as taught by *Arai* do not engage an edge of the substrate. Moreover, a first end of the lift pins as taught by *Arai* do not is laterally moveable to center a substrate on a substrate support, and a second end of each lift pin is not configured to engage the bottom of the chamber body when the substrate support is in a lowered position to cause the lateral movement of the first end.

Thus, *Arai* does not teach or suggest at least three elements movably coupled to a substrate support in a spaced-apart relation proximate a perimeter of the substrate support, and a first end of each element adapted to engage an edge of the substrate, wherein the first end of each element is laterally moveable to center a substrate on the substrate support, and a second end of each element is not configured to engage the bottom of the chamber body when the

substrate support is in a lowered position to cause the lateral movement of the first end, as recited by claim 1.

Thus, for at least these reasons, the Applicant submits that claims 1-2 are patentable over *Arai*. Accordingly, the Applicant respectfully requests that the rejection be withdrawn and the claims allowed.

35 U.S.C. §103 Claims 3-4, 23 and 25

Claims 3-4, 23 and 25 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Arai* in view of United States Patent No. 6,104,002 issued August 15, 2000, to *Hirose, et al.* (hereinafter referred to as *Hirose*). In response, the Applicant has amended claim 1 and cancelled claim 23 to more clearly recite certain aspects of the invention.

Independent claim 1 recites elements not taught or suggested by the combination of *Arai* and *Hirose*. The teaching of *Arai* has been discussed above. *Hirose* teaches forming apertures in a support plate to allow support pins passing therethrough to contact and support a substrate through a bottom side of the substrate. Therefore, the support pins as taught by *Hirose* do not engage an edge of the substrate or center the substrate on the substrate support. Modifying the substrate support as taught by *Arai* with apertures as taught by *Hirose* would not yield at least three elements movably coupled to a substrate support in a spaced-apart relation proximate a perimeter of the substrate support, and a first end of each element adapted to engage an edge of the substrate, wherein the first end of each element is laterally moveable to center a substrate on the substrate support, and a second end of each element is not configured to engage the bottom of the chamber body when the substrate support is in a lowered position to cause the lateral movement of the first end, as recited by claim 1. As such, a *prima facie* case of obviousness has not been established as the references fail to teach all the elements.

Thus, for at least the reasons discussed above, the Applicant submits that claims 3-4, which depend from claim 1, are patentable over the combination of *Arai* and *Hirose*. Accordingly, the Applicant respectfully requests that the rejection be withdrawn and the claims allowed.

35 U.S.C. §103 Claims 5 and 10-11

Claims 5 and 10-11 stand rejected under 35 U.S.C. § 103(a) as being unpatentable by *Arai* in view of *Hirose* as applied to claim 4 and further in view of European Patent No. 0290218 issued to *Meares, et al.* (hereinafter referred to as *Meares*). In response, the Applicant has amended claim 1 and cancelled claim 23 to more clearly recite certain aspects of the invention.

Independent claim 1 recites elements not taught or suggested by the combination of *Arai*, *Hirose* and *Meares*. The teachings of *Arai* and *Hirose* have been discussed above. *Meares* teaches using grasping fingers to touch edges of a substrate disposed on a platen to prevent the substrate from slipping out during platen rotation. Grasping fingers coupled in the platen are actuated by a motor mounted exterior of the chamber. (Figure 2). *Meares* does not teach or suggest that a second end of each element positioned below a second side of a substrate support and adapted to engage a bottom of a chamber body when a substrate is in a lowered position, as recited by claim 1. Therefore, combining fingers as taught by *Meares* and apertures taught by *Hirose* into the substrate support as taught by *Arai* would not yield at least three elements movably coupled to a substrate support in a spaced-apart relation proximate a perimeter of the substrate support, and a first end of each element adapted to engage an edge of the substrate, wherein the first end of each element is laterally moveable to center a substrate on the substrate support, and a second end of each element is not configured to engage the bottom of the chamber body when the substrate support is in a lowered position to cause the lateral movement of the first end, as recited by claim 1. As such, a *prima facie* case of obviousness has not been established as the references fail to teach or suggest all of the claim elements.

Thus, for at least the reasons discussed above, the Applicant submits that claims 5 and 10-11, all of which directly or indirectly depend from claim 1 are patentable over the combination of *Arai*, *Hirose* and *Meares*. Accordingly, the Applicant respectfully requests that the rejection be withdrawn and the claims allowed.

35 U.S.C. §103 Claim 8

Claim 8 stands rejected under 35 U.S.C. § 103(a) as being unpatentable by *Arai* in view of *Hirose* and further in view of United States Patent Publication No. 2003/0778741 published June 26, 2003, to *Gibson et al.*, (hereinafter referred to as *Gibson*). In response, the Applicant has amended claim 1 and cancelled claim 23 to more clearly recite certain aspects of the invention.

Independent claim 1 recites elements not taught or suggested by the combination of *Arai*, *Hirose* and *Gibson*. The teachings of *Arai* and *Hirose* have been discussed above. *Gibson* teaches attaching rollers to lift pins to vertically orient the lift pins. However, *Gibson* fails to teach or suggest a modification to *Arai* and *Hirose* that would yield at least three elements movably coupled to a substrate support in a spaced-apart relation proximate a perimeter of the substrate support, and a first end of each element adapted to engage an edge of the substrate, wherein the first end of each element is laterally moveable to center a substrate on the substrate support, and a second end of each element is not configured to engage the bottom of the chamber body when the substrate support is in a lowered position to cause the lateral movement of the first end, as recited by claim 1. As such, a *prima facie* case of obviousness has not been established as the references fail to teach or suggest all the claim elements.

Thus, for at least the reasons discussed above, the Applicant submits that claim 8 which depends from claim 1 is patentable over the combination of *Arai*, *Hirose* and *Gibson*. Accordingly, the Applicant respectfully requests that the rejection be withdrawn and the claims allowed.

35 U.S.C. §103 Claim 24

Claim 24 stands rejected under 35 U.S.C. § 103(a) as being unpatentable by *Arai* in view of *Meares*. In response, the Applicant has amended claim 1 and cancelled claim 23 to more clearly recite certain aspects of the invention.

Independent claim 1 recites elements not taught or suggested by the combination of *Arai* and *Meares*. The teaching of *Arai* has been discussed above. *Meares* teaches using grasping fingers to touch edges of a substrate disposed on a platen to prevent the substrate from slipping out during platen rotation. However, *Meares* fails to teach or suggest a modification to *Arai* that would yield at least three elements movably coupled to a substrate support in a spaced-apart relation proximate a perimeter of the substrate support, and a first end of each element adapted to engage an edge of the substrate, wherein the first end of each element is laterally moveable to center a substrate on the substrate support, and a second end of each element is not configured to engage the bottom of the chamber body when the substrate support is in a lowered position to cause the lateral movement of the first end, as recited by claim 1. As such, a *prima facie* case of obviousness has not been established as the references fail to teach or suggest all the claim elements.

Thus, for at least the reasons discussed above, the Applicant submits that claim 8 which depends from claim 1 is patentable over the combination of *Arai*, *Hirose* and *Gibson*. Accordingly, the Applicant respectfully requests that the rejection be withdrawn and the claims allowed.

CONCLUSION

Thus, for at least the reasons discussed above, the Applicant submits that all claims now pending are in condition for allowance. Accordingly, both reconsideration of this application and swift passage to issue are earnestly solicited.

If the Examiner believes that any unresolved issues still exist, it is requested that the Examiner telephone Keith Taboada at (732) 530-9404 so that appropriate arrangements can be made for resolving such issues as expeditiously as possible.

Respectfully submitted,

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Date



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